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Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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BUTCH TONGATE
Cabinet Secretary

J.C. BORREGO
Deputy Secretary

Certified Mail - Return Receipt Requested

April 11, 2017

Mr. Dennis Romero, Director
Water/Wastewater & Sanitation
City of Gallup
230 S. Second Street
Gallup, New Mexico 87301

**Re: City of Gallup Wastewater Treatment Plant; Major; Individual Permit; SIC 4952;
Compliance Evaluation Inspection; NPDES Permit NM0020672; March 21, 2017**

Dear Mr. Romero:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

David Long
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Fountain Place
1445 Ross Avenue
Dallas, Texas 75202-2733

Sarah Holcomb
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

City of Gallup
April 11, 2017
Page 2

If you have any questions about this inspection report, please contact Sandra Gabaldon at (505) 827-1041 or at sandra.gabaldon@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: David Long, USEPA (6EN-WM) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
Darlene Whitten-Hill, USEPA (6EN-WC) by e-mail
Brent Larsen, USEPA (6WQ-PP) by e-mail
NMED District I office by e-mail

SECTION A – PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED NO)

DETAILS: The permit expired in September 30, 2016. EPA is currently working on the renewal permit.

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE

☒ Y ☐ N ☐ NA

2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES

☐ Y ☐ N ☒ NA

3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT

☒ Y ☐ N ☐ NA

4. ALL DISCHARGES ARE PERMITTED

☒ Y ☐ N ☐ NA

SECTION B – RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.

☐ S ☒ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.

☒ Y ☐ N ☐ NA

2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.

☒ S ☐ M ☐ U ☐ NA

a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING

☒ Y ☐ N ☐ NA

b) NAME OF INDIVIDUAL PERFORMING SAMPLING

☒ Y ☐ N ☐ NA

c) ANALYTICAL METHODS AND TECHNIQUES.

☒ Y ☐ N ☐ NA

d) RESULTS OF ANALYSES AND CALIBRATIONS.

☒ Y ☐ N ☐ NA

e) DATES AND TIMES OF ANALYSES.

☒ Y ☐ N ☐ NA

f) NAME OF PERSON(S) PERFORMING ANALYSES.

☒ Y ☐ N ☐ NA

3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.

☒ S ☐ M ☐ U ☐ NA

4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.

☒ S ☐ M ☐ U ☐ NA

5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.

☒ Y ☐ N ☐ NA

SECTION C – OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.

☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.

☒ S ☐ M ☐ U ☐ NA

2. TREATMENT UNITS PROPERLY MAINTAINED.

☒ S ☐ M ☐ U ☐ NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .

☒ S ☐ M ☐ U ☐ NA

4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

☐ S ☐ M ☐ U ☐ NA

5. ALL NEEDED TREATMENT UNITS IN SERVICE

☐ S ☒ M ☐ U ☐ NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.

☒ S ☐ M ☐ U ☐ NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.

☒ S ☐ M ☐ U ☐ NA

8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.

☒ Y ☐ N ☐ NA

STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.

☒ Y ☐ N ☐ NA

PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.

☒ Y ☐ N ☐ NA

SECTION C – OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?

☒ Y ☐ N ☐ NA
☒ Y ☐ N ☐ NA
☒ Y ☐ N ☐ NA

10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?

☐ Y ☒ N ☐ NA
☐ Y ☐ N ☒ NA

SECTION D – SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS.
 DETAILS:

☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED NO).

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.

☒ Y ☐ N ☐ NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.

☒ Y ☐ N ☐ NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.

☒ Y ☐ N ☐ NA

4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.

☒ Y ☐ N ☐ NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.

☒ Y ☐ N ☐ NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE

☒ Y ☐ N ☐ NA

a) SAMPLES REFRIGERATED DURING COMPOSITING.

☒ Y ☐ N ☐ NA

b) PROPER PRESERVATION TECHNIQUES USED.

☒ Y ☐ N ☐ NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.

☒ Y ☐ N ☐ NA

7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE
 THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?

☐ Y ☐ N ☒ NA

SECTION E – FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.
 DETAILS:

☐ S ☒ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED YES)

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.
 TYPE OF DEVICE" 12" Parshall Flume

☒ Y ☐ N ☐ NA

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.

☒ Y ☐ N ☐ NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.

☒ Y ☐ N ☐ NA

4. CALIBRATION FREQUENCY ADEQUATE.

☐ Y ☒ N ☐ NA

RECORDS MAINTAINED OF CALIBRATION PROCEDURES.

☐ Y ☒ N ☐ NA

CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.

☐ Y ☒ N ☐ NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.

☒ Y ☐ N ☐ NA

6. HEAD MEASURED AT PROPER LOCATION.

☒ Y ☐ N ☐ NA

7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.

☒ Y ☐ N ☐ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.
 DETAILS:

☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED NO)

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)

☒ Y ☐ N ☐ NA

CITY OF GALLUP						PERMIT NO. NM0020672	
SECTION F - LABORATORY (CONT'D)							
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA	
4. QUALITY CONTROL PROCEDURES ADEQUATE.						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA	
5. DUPLICATE SAMPLES ARE ANALYZED. <u>100</u> % OF THE TIME.						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
6. SPIKED SAMPLES ARE ANALYZED. <u>100</u> % OF THE TIME.						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
7. COMMERCIAL LABORATORY USED.						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
LAB NAME <u>Hall Environmental Analysis Laboratory</u>							
LAB ADDRESS <u>4901 Hawkins, NE; Albuquerque, NM 87109</u>							
PARAMETERS PERFORMED <u>BOD, TDS, Copper</u>							
SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. <input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u>).							
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	None	None	No	YES	None	Clear	
RECEIVING WATER OBSERVATIONS <u>Receiving water had visible foam leaving the WWTP</u>							
SECTION H - SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.				<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u>).			
DETAILS: Sludge taken to authorized special waste landfill							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY.						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: <u>N/A</u> (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)							
SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED <u> </u>).							
1. SAMPLES OBTAINED THIS INSPECTION.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
2. TYPE OF SAMPLE OBTAINED							
GRAB <u> </u>		COMPOSITE SAMPLE <u> </u>		METHOD <u> </u>		FREQUENCY <u> </u>	
3. SAMPLES PRESERVED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
4. FLOW PROPORTIONED SAMPLES OBTAINED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
7. SAMPLE SPLIT WITH PERMITTEE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="0"/> <input type="text" value="6"/> <input type="text" value="7"/> <input type="text" value="2"/> 11 12 <input type="text" value="1"/> <input type="text" value="7"/> <input type="text" value="0"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/> 17 18 <input type="text" value="C"/> 19 <input type="text" value="S"/> 20 <input type="text" value="1"/>					
<input type="text" value="M"/> <input type="text" value="A"/> <input type="text" value="J"/> <input type="text" value="0"/> <input type="text" value="R"/> <input type="text" value="W"/> <input type="text" value="W"/> <input type="text" value="T"/> <input type="text" value="P"/> <input type="text" value="-"/> <input type="text" value="G"/> <input type="text" value="A"/> <input type="text" value="L"/> <input type="text" value="L"/> <input type="text" value="U"/> <input type="text" value="P"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="1"/> 69	70 <input type="text" value="3"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text" value=""/>	74 <input type="text" value=""/>
				75 <input type="text" value=""/>	80 <input type="text" value=""/>

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Gallup WWTP, I-40 east to Exit 26, East on Historic 66, Right on Industry Road, to WWTP.	Entry Time /Date 1045 Hours / March 21, 2017	Permit Effective Date October 1, 2011
	Exit Time/Date 1420 Hours / March 21, 2017	Permit Expiration Date September 30, 2016
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Joseph Quintana, CH2M, Operations Supervisor / (505) 287-2910, (505) 287-2909, (505) 290-3110 (cell) David Stanford, Senior Operations Specialist CH2M (865) 599-8575	Other Facility Data SIC 4952 35°30'50.17" N -108°59'01.3" W	
Name, Address of Responsible Official/Title/Phone and Fax Number Dennis Romero, Director of Water/Wastewater & Sanitation City of Gallup 230 S Second Street Gallup, NM 87301 (505) 863-1289 / dromero@GallupNM.gov	Yes <input type="checkbox"/> * <input type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="text" value="S"/> Permit	<input type="text" value="M"/> Flow Measurement	<input type="text" value="S"/> Operations & Maintenance	<input type="text" value="N"/> CSO/SSO
<input type="text" value="M"/> Records/Reports	<input type="text" value="S"/> Self-Monitoring Program	<input type="text" value="S"/> Sludge Handling/Disposal	<input type="text" value="N"/> Pollution Prevention
<input type="text" value="S"/> Facility Site Review	<input type="text" value="N"/> Compliance Schedules	<input type="text" value="N"/> Pretreatment	<input type="text" value="N"/> Multimedia
<input type="text" value="M"/> Effluent/Receiving Waters	<input type="text" value="S"/> Laboratory	<input type="text" value="N"/> Storm Water	<input type="text" value=""/> Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Please see checklist and further explanations for details of findings

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldon /s/ Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041/(505) 827-0160	Date April 11, 2017
Signature of Management QA Reviewer /s/ Jennifer Foote Jennifer Foote, Municipal Team Lead	Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 827-0596/(505) 827-0160	Date April 11, 2017

CITY OF GALLUP
NPDES PERMIT #NM0020602
COMPLIANCE EVALUATION INSPECTION
DATE OF INSPECTION: MARCH 21, 2017

INTRODUCTION:

A Compliance Evaluation Inspection (CEI) was conducted at the Gallup Wastewater Treatment Plant located in Gallup, New Mexico on March 21, 2017 by Sandra Gabaldón and Daniel Valenta of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). This facility is a major discharger classified under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program, and is assigned NPDES permit number NM0020672. The facility design flow is 3.5 million gallons per day (MGD).

The Gallup Wastewater Treatment Plant (WWTP) discharges into the Puerco River in Segment 20.6.4.99 NMAC, a tributary of the Lower Colorado River.

The NMED performs a specific number of CEI's annually for the United States Environmental Protection Agency (USEPA). The purpose of this inspection is to provide the USEPA with information to evaluate the permittee's compliance with their NPDES permit. The enclosed inspection report is based on verbal information supplied by the permittee's representatives, observations made by the NMED inspectors, and a review of records maintained by the permittee, commercial laboratories, and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative Further Explanations section of the report.

The inspectors arrived at the Gallup Wastewater Treatment Plant at 1045 hours and conducted an entrance interview with Mr. Joseph Quintana, Operations Supervisor, CH2M, along with Mr. David Sanford, Senior Operations Specialist, CH2M. The inspectors made introductions, presented their credentials, and discussed the purpose of the inspection with the representatives present. Thereafter, Mr. Dennis Quintana, Director of Water/Wastewater & Sanitation, City of Gallup, joined the inspection. A closing conference to discuss preliminary findings of the inspection was conducted at 1420 hours with Messrs. Quintana, Sanford and Romero.

TREATMENT SCHEME:

Influent flow enters the facility through a 12 inch Parshall flume where a Drexelbrook flow sensor and recorder measure the influent flow. Influent is then lifted through two of three screw pumps to two mechanical bar screens which operate in parallel. The flow then enters the grit chamber where coarse material can settle out and is collected. The screenings and grit are collected and placed into a dumpster, which are later taken to the landfill. Flow then enters the primary clarifiers. Each clarifier has a skimmer arm and a skirt to contain floating material. Scrapers in the bottom of the clarifiers are used to move

the sludge into a hopper in the center of the units. Sludge is taken to the primary digester from this point.

The flow is then recombined and sent to the aerators which rely on mechanical brush aerators to supply oxygenation.

The flow is then sent to the mixed media filters with three stages (gravel, sand and coal) to further filter the wastewater before being sent to disinfection. These filters are backwashed and the backwashed water is then sent to the headworks to be recombined with the influent flow. Flow from the filters enters the serpentine chlorine contact chambers. Chlorine gas is added to the effluent at the entrance of the contact basins for disinfection and sulfur dioxide is used as a dechlorinating agent at the exit of the basins to eliminate chlorine after disinfection.

The effluent is measured by a 12-inch Parshall flume and ultrasonic totalizer. NPDES sampling is collected at the Parshall flume. The discharge enters the Puerco River in segment 20.6.4.99 NMAC.

SLUDGE:

Waste activated sludge is wasted to the aerated sludge digester. Belt pressed sludge is taken to the local landfill for final disposal.

Section B – Recordkeeping and Reporting – Overall Rating of “Marginal”

In Part IV of the permit, it states:

Discharge Monitoring Reports and Other Reports:

Monitoring results must be reported to EPA on either the electronic or paper Discharge Monitoring Report (DMR) approved formats. However, the EPA published the electronic reporting rule in the federal register (80 FR 64063) on October 22, 2015. The rule became effective on December 21, 2015. One year after the effective date of the final rule, NPDES regulated entities that are required to submit DMRs (including majors and non-majors, individually permitted facilities and facilities covered by general permits) must do so electronically. All DMRs shall be electronically reported effective December 21, 2016, per 40 CFR 127.16.

Findings for Recordkeeping and Reporting:

The permittee has failed to report Discharge Monitoring Reports electronically. Mr. Romero stated that the city is working with EPA to get this completed; however, they have run into some issues

with getting signatory authority approval for CH2M, the contracted operator at this site. This is an ongoing process and they believe they will be submitting Net DMRs. An email was received from Mr. Quintana on April 7, 2017 stating that because they are a contracted operator, they do not have signatory authority. Mr. Quintana is working on getting “editing” permissions for the Net DMR. Mr. Romero, City of Gallup is the signatory authority for this WWTP.

Section C – Operation and Maintenance – Overall Rating of “Satisfactory”

The permit states in Part I, Section D.:

The permittee shall report all overflows with DMR submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: date, time, duration, location, estimated volume, and cause of the overflow. They shall also include observed environmental impacts from the overflow; actions taken to address the overflow; and the ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary).

Overflows that endanger health or the environment shall be orally reported to EPA at (214)665-6595 and NMED Surface Water Quality Bureau at (505) 827-0187, within 24 hours from the time the permittee becomes aware of the circumstance. A written report of overflows that endanger health or the environment shall be provided to EPA and NMED Surface Water Quality Bureau within 5 days of the time the permittee becomes aware of the circumstance.

Findings for Operations and Maintenance:

The permittee has had several Sanitary Sewer Overflows (SSOs). Each SSO has been reported to EPA and NMED. On the date of the inspection, it was noted that there had been a manhole within the WWTP that had an overflow. Discussion with Mr. Quintana and the operator suggested that approximately 70 gallons may have overflowed the manhole but was not reported. Mr. Quintana believed there was a de minimis amount before any overflow needed to be reported. The inspector explained the requirements of the permit. Mr. Quintana stated he would send in all overflow reports with DMRs as needed.

Section E – Flow Measurement – Overall Rating of “Marginal”

Permit requires in Part III, C.6 Flow measurement:

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored

discharges. The devices shall be installed, calibrated and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.

Findings for Flow measurement:

The permittee could not provide calibration documentation of their ultrasonic totalizer to insure the device is measuring flow with a maximum deviation of less than 10% from true discharge rates.

The permittee has no documentation of doing calibration checks of ultrasonic totalizer and the staff gauge in the Parshall Flume.

**NMED/SWQB
Official Photograph Log
Photo # 1**

Photographer: Daniel Valenta	Date: 03/21/2017	Time: 1048 Hours
City/County: Gallup /		State: New Mexico
Location: City of Gallup Wastewater Treatment Plant		
Subject: Manhole overflow within the WWTP.		



NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Daniel Valenta	Date: 03/21/2017	Time: 1140 Hours
City/County: Gallup /		State: New Mexico
Location: City of Gallup Wastewater Treatment Plant		
Subject: Noticeable foam in the effluent discharge.		

